

SEEGERWEISS^{LLP}

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June 10, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: *In re: Insulin Pricing Litigation*, MDL No. 3080
No. 2:23-md-03080-BRM-RLS**

Dear Judge Singh:

In accordance with the Court's May 28, 2024 Order [ECF No. 186], the parties hereby jointly submit a proposed ESI Protocol that conforms with Your Honor's rulings. We thank the Court for its continued attention to this matter.

Respectfully submitted,

s/ David R. Buchanan

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Counsel for the Self-Funded Payer Track

s/ Joanne Cicala

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Counsel for the State Attorney General Track

s/ Melissa L. Yeates

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Track (PBM)*

s/ James E. Cecchi

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s/ Liza M. Walsh

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s/ Patrick A. Harvey

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Counsel for Express Scripts Defendants

s/ Andrew Yaphe

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Counsel for Defendant Novo Nordisk Inc.

s/ A. Joshua Podoll

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Counsel for CVS Caremark Defendants

s/ Ryan Moorman

Ryan Moorman

Counsel for Defendant Eli Lilly and Company

s/ Kelley Barnaby

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Counsel for OptumRx Defendants

cc: Hon. Brian R. Martinotti, U.S.D.J. (via ECF)
Counsel of Record (via ECF)